

*Just - I faxed an advance  
draft to Steve Yaeger & sent it  
a copy for Ray to review & approve.*

To: Steve Yaeger  
Assistant Executive Director (verify title)  
Cal/Fed Bay-Delta Program

From: Rick Woodard

Subject: September 14, 1995 Workshop

*I have heard nothing further on this.  
Please ck w/ Ray to see if we  
can finalize. If so, sign from  
Thom Jc*

The following are comments on the September 1, 1995 document from Lester Snow, and observations concerning the September 14, 1995 workshop which was held to discuss the document.

It is understood, based on statements made at the workshop, that the water quality portion of the draft is subject to further consideration of comments previously submitted by this Department and others. Accordingly, it should not be necessary to restate those comments. One previously made point does, however, deserve amplification. At the workshop, it became clear there is a constituency in favor of statements that unequivocally declare a problem exists, and likewise identify the cause. As examples: "Agriculture and water hyacinth control cause herbicide problem"; "Diversion of water from the Delta affects water quality (reduces dilution, increases salinity)"; "Level of diversion too high (reduces dilution of water quality problems)." [Reference - p.1, Water Quality, Causes].

These statements are not entirely accurate. To our knowledge, there is a paucity of evidence to support a contention that hyacinth control in the Delta has significantly impacted beneficial uses. Diversion of water from the Delta can sometimes cause a salinity increase in some parts of the Delta. However, if diversions in the southern Delta were stopped, mineral quality of southern Delta waters would be expected to be reduced. Whether the level of diversion is too high with respect to water quality is a complex issue that has required many years of study, and is certainly not something that can be answered in a categorical way.

Where there is sufficient evidence to support unequivocal statements, it is appropriate to make them. However, though some would be pleased to see inadequately supported statements incorporated within the framework of the Cal/Fed process, doing so is likely to create substantial liabilities. The work

products of Cal/Fed must ultimately stand the test of technical adequacy. It is not, therefore, sufficient to arrive at statements which make some constituencies comfortable. Perhaps more important, publishing categorical statements at this stage of the Cal/Fed process tends to be pejorative with respect to some estuary stakeholders.

If, for instance, problems are said to result from hyacinth control, those engaged in the activity are likely to feel defensive, a result that would be unfortunate if the statement turned out to be untrue. Negative effects such as this would be inconsistent with the concept of a Cal/Fed process which is inclusive, balanced, scientifically based, and directed at consensus building. We strongly recommend all Cal/Fed statements of problems, causes, objectives, and solutions be subjected to rigorous truth testing and modification as necessary to accurately reflect the state of scientific understanding upon which the statements are based.

One commenter at the workshop noted that the Water Quality Problem Statements contained significantly less detail than problem statements for other use categories. We agree that additional detail is needed, and assume the next revision of the draft will address this issue.

An additional category should be added to the Water Quality Objective Statements. Suggested wording: "Maximize the reclaimability and reusability of Delta source waters by minimizing water quality degradation."

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